



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

Electronic Mail
Read Receipt Requested

Don Wiggins, Manager of Technical Services
Bluestone Coke, LLC
3500 35th Avenue North
Birmingham, Alabama 35207

RE: Interim Measures Work Plan (IMWP) Soil and Groundwater
SWMU Management Area (SMA) 3 – Coke Manufacturing Plant
Administrative Order on Consent – Docket # RCRA 04-2012-4255
EPA ID Number: ALD 000 828 848

Dear Mr. Wiggins,

During the October 5, 2022, conference call EPA stated its intent to request an Interim Measures Work Plan based on EPA's review of the Corrective Measure Study (CMS) Report for SMA 3 (Revision 1.0) and Response to Comments dated October 21, 2021, submitted by Bluestone Coke pursuant to RCRA Section 3008(h) Administrative Order on Consent (AOC) effective August 1, 2016. EPA has evaluated the proposed final remedy for remedial measures that includes in-situ soil source treatment and in-situ groundwater treatment portion of Alternative 4 in Section 6.2.4 of the CMS Revision 1.0 for SMA 3 soil and AOC E Groundwater. EPA is requesting BSC to submit an Interim Measures Work Plan with detailed plans for monitoring, construction, and implementation of both the in-situ soil treatment and in-situ groundwater treatment as a pilot study for a specific area in SMA 3. The in-situ soil source treatment and in-situ groundwater will be implemented as focused pilot studies to demonstrate effectiveness of the remedy prior to public notice as a final remedy by EPA. The pilot studies will present the opportunity to study the efficacy of the remedies and adjust the remedies as needed to meet the groundwater protection standards and assist in designing a comprehensive remediation system in the Corrective Measures Implementation Plan. Should the interim measures implemented prove effective it shall be a component of the final remedy that EPA shall propose in the Statement of Basis for Public Notice and Public Comment. EPA is requesting that BSC select an area within SMA 3 that has naphthalene at concentrations in the soil and groundwater that exceed the preliminary cleanup standards (PCS) discussed in the CMS. EPA recommends the pilot study area for the IMWP be in the vicinity of SWMU #5 Coal Tar Storage Drain System where the impacts to soil and groundwater exceed the PCS.

EPA requests that Bluestone Coke LLC, submit an Interim Measures Work Plan for SMA 3 source area soil and groundwater for SMA 3 Coke Manufacturing Plant pursuant to Section IX Interim Measures Paragraph 26 of the Administrative Order on Consent under RCRA Section 3008(h) effective August 1, 2016. The Interim Measures Work Plan is due within sixty (60) days of receiving EPA's correspondence.

If you have any questions concerning this matter, please contact me at (770) 853-8318 or by electronic mail at smith.jamesh@epa.gov.

Sincerely,

James H. Smith
Corrective Action Specialist
RCRA Corrective Action Section
RCRA Programs and Cleanup Branch

cc: Rob Fowler, Bluestone Coke (via email)
Terry Rippstein, Terracon (via email)
Chip Crockett, ADEM (via email)